

King County Board of Health
Background on Pet Business Regulations

- Focus on businesses permitted for the first time by Public Health -

Why will pet grooming businesses in Seattle be permitted?

While groomers in Seattle have not been permitted under the old Seattle Health Codes, pet grooming businesses in nearly all other cities and in unincorporated King County have been permitted for many years under KC Title 11 Animal Control. The new Board of Health regulations will bring uniform requirements into effect throughout the County. These regulations will provide strong sanitation standards and help protect county residents and pet business employees against zoonotic diseases. Diseases that may be transmitted during grooming services include fungal infections (e.g., ringworm), bacterial skin infections (e.g., methicillin-resistant staphylococcus aureus, MRSA), and enteric pathogens (*Salmonella*, *Campylobacter*, *E. coli*).

Why will feed stores selling baby chicks and other live poultry be permitted?

Residents of Seattle and King County are increasingly keeping backyard poultry for egg production or as pets. The city of Seattle allows residents to keep 3 hens on residential properties, and more may be kept on larger lots and in many suburban or rural areas of the county. Poultry, especially young chicks and ducklings, are a well-known source of *Salmonella* infection for people, especially children. Over the last 10 years, at least 5 human outbreaks of *Salmonella* were traced to exposure to chicks. One of the largest of these outbreaks affected 22 residents of Washington and Oregon, some of whom had to be hospitalized. Half of those sick were under 13 years of age. In 2006, there were 3 national outbreaks of poultry-associated *Salmonella* which affected people in multiple states.

Each year, there are an estimated 1.4 million *Salmonella* infections in the U.S. with thousands of people hospitalized and over 500 deaths. While it is not known how many of these cases are contracted from baby poultry, health experts at the federal Centers for Disease Control and Prevention believe that the number is significant and recommend that public health departments address the issue through educational campaigns. In response, the WA State Department of Health has developed posters, brochures and children's stickers and urges feed stores to voluntarily display warnings and provide point-of-sale information in an effort to reduce the risk of *Salmonella* infections transmitted by baby poultry.

Why will pet food retailers selling raw animal-derived pet foods be permitted?

Feeding of raw pet foods of animal origin has become increasingly popular among dog, cat and ferret owners over the past decade. Many brands of commercially-produced raw animal-derived diets and natural pet treats are available at pet food and supply stores as well as at some grocery stores located in King County. Animal-derived raw foods may contain chicken, turkey, ostrich, quail, duck, rabbit, venison, bison, lamb, pork, beef, fish, shrimp, clams or conch. Some of these are formulated with grain and vegetables as complete diets that may be sold in a tube or plastic container. Other products consist of raw meat or seafood that pet owners purchase to add to other ingredients when preparing home-made raw diets. Also sold are "meaty bones" such as duck necks, chicken backs or untrimmed beef bones, which are fed whole and consumed raw. These products are perishable and need to be stored refrigerated or frozen and kept separate from foods intended for human consumption. Frozen products are defrosted at home by the pet owner.

Transmission of pathogens from raw pet foods can occur directly or indirectly. Pet owners may be infected directly while handling the raw food and scooping it into the pet's bowl or indirectly from contaminated environmental surfaces. People may also contract infections if the pet becomes

King County Board of Health
Background on Pet Business Regulations

- Focus on businesses permitted for the first time by Public Health -

infected and sheds the pathogen in feces. Examples of how raw pet foods could cause cross-contamination with human foods include storing the raw pet food in the refrigerator and having juices drip into human foods; slicing tubes of raw pet food on a kitchen cutting board followed by preparation of raw human food such as salad or vegetables; use of knives or other utensils that aren't washed well before preparing human food; thawing human and pet food side by side in a bowl or in the microwave; or having raw food drip onto countertops or dishes or contaminate sponges and kitchen towels. Young children could be exposed to harmful bacteria when they crawl or play on the floor where pets are fed or if they handle pet food dishes.

In addition to raw foods, "natural" pet treats, which may be raw, smoked or dried, have been responsible for illnesses in pet owners. Natural treats available for pets include salmon, chicken and beef jerky and animal parts such as lamb and pig ears, beef and pig snouts, animal hooves and tails, and beef trachea. In 2005, 9 residents of King County, WA and western Canada were confirmed to have illness caused by *Salmonella*-contaminated pet treats made of beef or salmon and linked to a manufacturing plant in Washington and a manufacturer/distributor in British Columbia. The strains of *Salmonella* bacteria from the ill people and samples of pet treats remaining in the households were identical on laboratory analysis. Two other outbreaks related to natural pet treats have also been reported in Canada. [Ref: CDC. Human salmonellosis associated with animal-derived pet treats—U.S. and Canada, 2005. **Morbidity and Mortality Weekly Report** 2006;55(25):702-05].

Many pet owners are passionate about their choice of these foods for their pets and describe positive health effects. Data from Canada suggests that as many as 1 in 5 dogs are fed a commercial or homemade raw meat diet at least part of the time. The American Pet Product Manufacturers' Association estimates that 40% of dog owners purchase natural pet treats 5 times a year, on average. In a 2006 survey of King County veterinarians, raw food diets were among the top ten zoonotic disease issues discussed by veterinarians and pet owners.

Raw animal-derived pet foods and treats present a risk of disease transmission to people for the following reasons:

- Studies have shown raw pet foods commonly contain pathogens that can cause illness in both pets and people. In one study performed by Colorado State University found *E. coli* bacteria in over half of 240 samples of 20 raw meat diets for dogs (these foods contained beef, lamb, chicken, or turkey) and *Salmonella enterica* in 6% of samples. A smaller percent of samples contained protozoa pathogens (*Cryptosporidia*, *Neospora*, and *Toxoplasma*). [Ref: Strohmeyer, et al. Evaluation of bacterial and protozoal contamination of commercially available raw meat diets for dogs. **Journal of the American Veterinary Medical Assoc** 2006; 228:537-42].
- An evaluation of 25 commercial raw diets for dogs and cats done at the University of Guelph found *Salmonella* in 20% of samples and *E. coli* in 64%. *Clostridium perfringens* bacteria, a leading cause of human food poisoning, were found in 20% of samples. [Ref: Weese, et al. Bacteriological evaluation of commercial canine and feline raw diets. **Canadian Veterinary Journal** 2005;46:513-16.]
- Studies have found multi-drug resistant *Salmonella* strains in pet foods or treats, heightening the risk of serious human disease. [Ref: Finley, et al. The occurrence and antimicrobial susceptibility of *Salmonellae* isolated from commercially available canine raw food diets in three Canadian cities. **Zoonoses and Public Health** 2008; 55:462-69.]
- Numerous published studies have found that *Campylobacter* bacteria are common in raw poultry meats. *Yersinia* bacteria are frequently isolated from raw meat, especially pork. Dogs may be infected with *Yersinia* types that also infect people and household transmission of the bacteria from dogs to people has been documented.

King County Board of Health
Background on Pet Business Regulations

- Focus on businesses permitted for the first time by Public Health -

- *Campylobacter* and *Salmonella* are the first and second leading causes of human food-borne illness in the U.S. [Source: CDC]. Our state health department receives reports of about 600-800 human salmonellosis cases a year and notes that many additional cases go undiagnosed and unreported. [Source: WA Dept of Health].
- Research has shown that dogs fed products contaminated with *Salmonella* bacteria often become infected and shed the bacteria in their feces for as long as several weeks. Infected dogs frequently remain clinically normal so the pet owner may have no clue that they are at risk of infection. Pet-to-person transmission of *Salmonella* can occur if good hygiene practices are not observed. [Ref: Finley, et al. The risk of *Salmonellae* shedding by dogs fed *Salmonella*-contaminated commercial raw food diets. **Canadian Veterinary Journal** 2007; 48:69-75].
- Both cats and dogs fed raw meat diets have been documented to develop serious salmonella infections. [Ref: Siver, et al. Septicemic salmonellosis in two cats fed a raw-meat diet. **Journal of the American Animal Hospital Assoc** 2003; 39:538-42] and [Ref: Morley, et al. Evaluation of the association between feeding raw meat and *Salmonella enterica* infections at a Greyhound breeding facility. **Journal of the American Veterinary Medical Assoc** 2006; 228:1524-32.]
- Veterinarians at the University of Guelph (Ontario, Canada) found that 22% of 138 pet dogs studied had at least one fecal sample positive for *Salmonella*. The single biggest risk factor for *Salmonella* infection in these dogs was having been fed a homemade or commercial raw meat diet. [Ref: E. K. Leonard, DVM. University of Guelph, as yet unpublished data collected during post-doctoral research.]
- In recent years, commercial raw pet foods have been recalled by the FDA for contamination with harmful *Salmonella* and *Listeria* bacteria. In 2007, the FDA reported that 15 different pet foods or treats were recalled due to *Salmonella* contamination. [Source: FDA. Tips for preventing foodborne illness associated with pet food and pet treats. Accessed on-line at www.fda.gov/AnimalVeterinary/NewsEvents/CVMUpdates/ucm048030.htm]
- Many people in our communities are at higher risk of acquiring these infections or having more serious disease as a result. People with immune suppression are at greater risk of illness due to food-borne contaminants. This includes transplant recipients, people on cancer chemotherapy, people with advanced HIV or AIDS, elderly people, pregnant women, and children less than 5 years of age.
- *E. coli* infection in children more often leads to hemolytic-uremic syndrome which can cause kidney failure or death
- *Salmonella* in immune suppressed people can result in serious blood-stream infections (septicemia), endocarditis, organ failure, and death
- *Listeria* infection in pregnant women can cause miscarriage
- *Toxoplasma* infection in pregnant women can cause birth defects or abortion

What recommendations do health organizations make about preventing human illness associated with raw pet foods or treats?

1) Statement on Raw Food Diets from the U. S. Food and Drug Administration (FDA):

The FDA does not believe raw meat pet foods are consistent with the goal of protecting the public from significant health risks, particularly when such products are brought into the home and/or used to feed domestic pets. The FDA does not advocate a raw meat, poultry or seafood diet for

King County Board of Health
Background on Pet Business Regulations

- Focus on businesses permitted for the first time by Public Health -

pets, but is stepping up its efforts to minimize the risk such foods pose to animal and human health because we understand that some people prefer to feed these types of diets to their pets.

For the protection of both you and your pet, the FDA recommends you follow these instructions when handling or using raw meat, poultry or seafood, for use in a pet's diet:

- Keep raw meat and poultry products frozen until ready to use.
- Thaw in refrigerator or microwave.
- Keep raw food diets separate from other foods.
- Wash working surfaces, utensils (including cutting boards, preparation and feeding bowls), hands, and any other items that touch or contact raw meat, poultry or seafood with hot soapy water.
- Cover and refrigerate leftovers immediately or discard safely.
- For added protection, kitchen sanitizers should be used on cutting boards and counter tops periodically. A sanitizing solution can be made by mixing one teaspoon of chlorine bleach to one quart of water.
- If you use plastic or other non-porous cutting boards, run them through the dishwasher after each use.

Source: FDA at www.fda.gov/AnimalVeterinary/NewsEvents/CVMUpdates/ucm048030.htm

2) Recommendations from food safety experts from Public Health Agency of Canada and the University of Guelph:

- Dog and cat owners should be made more aware of the zoonotic disease risks, including *Salmonella* potentially associated with natural pet treats and raw diets.
- Owners of animals receiving natural pet treats and raw food diets should be educated about safe handling of their pet and pet feces, cleaning and disinfection of contaminated areas in the household, restriction of contact with humans who might be at higher risk for developing disease (e.g., immunocompromised, very young, elderly), and appropriate hand hygiene.
- Dogs used for socialization and therapy at hospitals and long-term care facilities should not be fed raw food diets, pig ear treats or other pet treats made of dried animal parts.

Source: Finley, et al. Human health implications of *Salmonella*-contaminated natural pet treats and raw pet food. **Clinical Infectious Disease: Food Safety** 2006; 42:686-691.

3) Joint recommendations from the leading public health agencies of the U.S. and Canada:

- Persons should always wash their hands thoroughly with soap and water after handling animal-derived pet treats.
- Persons at increased risk for infection or serious complications of salmonellosis (e.g., children < 5 years, older adults, and immunocompromised persons) should avoid contact with animal-derived pet treats.
- Pet store owners, health-care providers, veterinarians, and pet treat manufacturers should provide information to pet owners about potential health risks of animal-derived pet treats and salmonellosis prevention.

King County Board of Health
Background on Pet Business Regulations

- Focus on businesses permitted for the first time by Public Health -

- Pet treat manufacturers should implement a step (e.g., heat treatment or irradiation) that destroys *Salmonella* and other bacteria during the processing of pet treats and should provide labels containing product information.

Source: U.S. Centers for Disease Control & Prevention and Public Health Agency of Canada, published in **MMWR**, June 30, 2006. See www.cdc.gov/mmwr/preview/mmwrhtml/mm5525a3.htm.

Doesn't the federal or state government regulate the production of pet food?

Raw animal-derived pet foods do not require premarket certification or approval under current U.S. laws. Although raw pet foods and pet treats are made from animal meats and by-products, they are not considered "fit for human consumption" by food regulatory agencies and accordingly they are not subject to the same regulations as food intended for humans. No federal or state human food safety agency oversees or regulates the pet food market in regards to safety of the product other than to provide guidance regarding product labeling, ingredients, health claims, and required permits for the production or importation of pet foods. Adherence to the guidelines is strictly voluntary.

Available guidance documents are:

- 1) *Guidelines for the Manufacturing of Natural Pet Treats for Pets* - from the American Pet Product Manufacturers Association; and
- 2) *Guidance for Industry: Manufacture and labeling of raw meat foods for companion and captive noncompanion carnivores and omnivores* - from the U.S. Food and Drug Administration (FDA). See <http://www.fda.gov/AnimalVeterinary/NewsEvents/FDAVeterinarianNewsletter/ucm100168.htm>

What is the role of the WSDA in raw pet food manufacturing or sales?

Manufacturers of pet food sold in Washington State are required to register their labels with the Washington State Department of Agriculture (WSDA) and comply with the labeling provisions in WAC 16-252 (see <http://apps.leg.wa.gov/wac/default.aspx?cite=16-252&full=true>). These regulations govern proper labeling of the product including manufacturer's name and address, product's weight, ingredients, nutritional analysis, instructions for use, and health claims. The regulations do not require premarket testing of pet food products for pathogens or other contaminants.

What is the role of USDA in raw pet food manufacturing?

Meats and animal tissues intended for animals other than people are not subject to U.S. Department of Agriculture (USDA) inspection, except for those pet foods certified by the USDA under its voluntary "Certified Pet Food" inspection program (9 CFR Part 355).

What is the role of the FDA in pet food manufacturing?

There is no requirement that pet food products have premarket approval or certification by the U.S. Food and Drug Administration (FDA). The U.S. Food and Drug Administration (FDA) regulates pet food under the Federal Food, Drug, and Cosmetic Act (FFDCA) and requires that pet foods, like human foods, be safe to eat, produced under sanitary conditions, contain no harmful substances

King County Board of Health
Background on Pet Business Regulations

- Focus on businesses permitted for the first time by Public Health -

and be truthfully labeled. However, FDA Compliance Policy Guide (CPG 7126.23) stipulates that investigation should only be conducted as a follow up to complaints or reports of injuries.

The FDA recommends, but does not require, that meat and animal tissue ingredients used in raw pet foods come from a USDA inspected facility and have passed USDA inspection and deemed fit for human consumption. While the FDA has Good Manufacturing Practice (GMP) regulations in place for human foods, the FDA has not promulgated GMPs for animal foods.

Given the public health risks of raw pet foods the FDA recommends, but does not require, that raw pet food manufacturers should take all measures necessary to minimize contamination by pathogenic organisms. The FDA lists such measures as including:

- a) irradiating the final product after packaging;
- b) participating in the USDA's voluntary inspection program (9 CFR Part 355);
- c) practicing GMPs such as those for human foods in 21 CFR Part 110; and
- d) developing and implementing Hazard Analysis and Critical Control Point (HACCP) programs to identify food safety hazard points and institute effective controls.

Source: FDA Center for Veterinary Medicine, 7500 Standish Pl, Rockville, MD 20855. Draft Guidance for Industry on Manufacture and Labeling of Raw Meat Foods for Companion Animals and Captive Noncompanion Carnivores and Omnivores is available on-line at <http://www.fda.gov/AnimalVeterinary/NewsEvents/FDAVeterinarianNewsletter/ucm100168.htm>

Is Public Health trying to discourage feeding of raw diets to dogs and cats?

No. Public Health takes no position on the value of raw foods to pet health and supports consumer choice on the types of food best for their pets. However, just like seafood, beef, chicken and other meats sold for human consumption, it is important that these perishable pet foods be handled properly.

Our goal is to prevent human illness by assuring products are properly labeled as a pet food, that they are stored at proper temperatures, and that purchasers have food safety information such as the importance of hand washing after handling raw foods and avoiding cross contamination with human foods prepared in the kitchen with common utensils or cutting boards. Maintaining ready contact with retailers selling raw pet foods will also allow Public Health to notify stores about product recalls when there is a potential for zoonotic disease transmission.